

U.S. Department of Justice

Washington, DC 20530

**Supplemental Statement****Pursuant to the Foreign Agents Registration Act of 1938, as amended**For 6 Month Period Ending 12/31/2020

(Insert date)

**I - REGISTRANT**

## 1. (a) Name of Registrant

Ruder Finn, Inc.

## (b) Registration Number

6840

## (c) Primary Business Address

425 East 53rd Street, New York City, NY 10022

## 2. Has there been a change in the information previously furnished in connection with the following?

## (a) If an individual:

- |                           |                              |                             |
|---------------------------|------------------------------|-----------------------------|
| (1) Residence address(es) | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (2) Citizenship           | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| (3) Occupation            | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

## (b) If an organization:

- |                          |                              |  |
|--------------------------|------------------------------|--|
| (1) Name                 | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (2) Ownership or control | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| (3) Branch offices       | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |

## (c) Explain fully all changes, if any, indicated in Items (a) and (b) above.

**IF THE REGISTRANT IS AN INDIVIDUAL, OMIT RESPONSES TO ITEMS 3, 4, 5, AND 6.**3. If the registrant previously filed an Exhibit C<sup>1</sup>, state whether any changes therein have occurred during this 6 month reporting period. Yes ☐ No ☒If yes, has the registrant filed an updated Exhibit C? Yes ☐ No ☐

If no, please file the updated Exhibit C.

<sup>1</sup> The Exhibit C, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, and by laws of a registrant that is an organization. (A waiver of the requirement to file an Exhibit C may be obtained for good cause upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530.)

4. (a) Have any persons become partners, officers, directors or similar officials during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Residence Address	Citizenship	Position	Date Assumed
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(b) Have any persons ceased acting as partners, officers, directors or similar officials of the registrant during this 6 month reporting period?

Yes ☐ No ☒

If yes, furnish the following information:

Name	Position	Date Ceased
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5. (a) Has any person named in Item 4(a) rendered services directly in furtherance of the interests of any foreign principal?

Yes ☐ No ☒

If yes, identify each such person and describe the service rendered.

Name	Foreign Principal(s) Represented	Services
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(b) During this 6 month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity? Yes ☒ No ☐

Name	Residence Address	Citizenship	Position	Date Assumed
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See Appendix for  
Response

(c) Have any employees or individuals, who have filed a short form registration statement, terminated their employment or connection with the registrant during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

Name	Position or Connection	Date Terminated
Brian Laird	Senior Vice President	11/23/2020

(d) Have any employees or individuals, who have filed a short form registration statement, terminated their connection with any foreign principal during this 6 month reporting period? Yes ☒ No ☐

If yes, furnish the following information:

Name	Position or Connection	Foreign Principal	Date Terminated
Brian Laird	Senior Vice President	NEOM Company	11/23/2020
Rebecca Baumgaertner	Senior Account Executive	NEOM Company	11/02/2020

6. Have short form registration statements been previously filed by all of the persons named in Items 5(a) and 5(b) of the supplemental statement or submitted with this filing? Yes ☒ No ☐

If no, list names of persons who have not previously filed the required statement or are not submitting a short form with this filing.

**II - FOREIGN PRINCIPAL**

7. Has the registrant's connection with any foreign principal(s) ended during this 6 month reporting period?

Yes ☒No ☐

If yes, furnish the following information:

Foreign Principal

Consulate General of The People's Republic of China in New York

Date of Termination

07/02/2020

8. Has the registrant added any new foreign principal(s)<sup>2</sup> during this 6 month reporting period?

Yes ☒No ☐

If yes, furnish the following information:

Foreign Principal

Huawei Technologies USA, Inc.

Consulate General of The People's Republic of China in New York

Date Added

09/07/2020

11/06/2020

9. In addition to those named in Items 7 and 8, if any, list the foreign principal(s) whom the registrant continued to represent during the 6 month reporting period.

NEOM Company

10. (a) Has the registrant filed Exhibits A and B for the newly added foreign principal(s), if any, listed in Item 8?

Exhibit A<sup>3</sup>Yes ☒No ☐N/A ☐Exhibit B<sup>4</sup>Yes ☒No ☐N/A ☐

If no, please file the required exhibit.

(b) Have there been any changes in the Exhibits A and B previously filed for any foreign principal(s) whom the registrant represented during this 6 month period?

Yes ☐No ☒

If yes, has the registrant filed an amendment to these exhibits?

Yes ☐No ☐

If no, please file the required amendment.

<sup>2</sup> The term "foreign principal" includes, in addition to those defined in Section 1(b) of the Act, an individual organization any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual. (See Rule 100(a) (9)). A registrant who represents more than one foreign principal is required to list in the statements he files under the Act only those principals for whom he is not entitled to claim exemption under Section 3 of the Act. (See Rule 208.)

<sup>3</sup> The Exhibit A, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal.

<sup>4</sup> The Exhibit B, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.

**III - ACTIVITIES**

11. During this 6 month reporting period, has the registrant engaged in any activities for or rendered any services to any foreign principal named in Items 7, 8, or 9 of this statement? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail all activities and services:

Foreign Principal	Activities/Services
NEOM Company	Design and development of a dedicated website, developed brand strategy, production of videos and developed and implemented social media strategy and policy for NEOM. Monitored social media platforms and assist with social media campaigns related to the promotion of NEOM as a city of the future.
Huawei Technologies USA, Inc.	Strategic counsel, media relations, analyst relations, data insights, content strategy and policy communications.
Consulate General of The People's Republic of China in New York	No Activities

12. During this 6 month reporting period, has the registrant, on behalf of any foreign principal, engaged in political activity<sup>5</sup> as defined below? Yes ☒ No ☐

If yes, identify each foreign principal and describe in full detail all such political activity, indicating, among other things, the relations, interests and policies sought to be influenced and the means employed to achieve this purpose. If the registrant arranged, sponsored or delivered speeches, lectures, social media, internet postings, or media broadcasts, give details as to dates, places of delivery, names of speakers and subject matter. The response must include, but not be limited to, activities involving lobbying, promotion, perception management, public relations, economic development, and preparation and dissemination of informational materials.

Set forth below a general description of the registrant's political activities.

Huawei Technologies USA, Inc.: Outreach to publications and facilitation of meetings with Huawei executives.

Set forth below in the required detail the registrant's political activities.

Foreign Principal	Date	Contact	Method	Purpose
See Appendix for Response				

13. In addition to the above described activities, if any, has the registrant engaged in activity or rendered any services on its own behalf which benefits the registrant's foreign principal(s)? Yes ☐ No ☒

If yes, describe fully.

Foreign Principal	Activities/Services

<sup>5</sup> "Political activity," as defined in Section 1(o) of the Act, means any activity that the person engaging in believes will, or that the person intends to, in any way influence any agency or official of the Government of the United States or any section of the public within the United States with reference to formulating, adopting or changing the domestic or foreign policies of the United States or with reference to political or public interests, policies, or relations of a government of a foreign country or a foreign political party.

#### 14. (a) RECEIPTS-MONIES

If no, please explain why no monies were received.

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies.<sup>6</sup>

\$ 705,039.45

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Total

(b) **RECEIPTS - FUNDRAISING CAMPAIGN**

If no, please file the required Exhibit D.

**(c) RECEIPTS-THINGS OF VALUE**

If yes, furnish the following information:

Foreign Principal	Date Received	From Whom	Purpose	Thing of Value
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9 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

**15. (a) DISBURSEMENTS-MONIES**

During this 6 month reporting period, has the registrant disbursed or expended monies in connection with activity on behalf of any foreign principal named in Items 7, 8, or 9 of this statement or transmitted monies to any such foreign principal? Yes ☒ No ☐

If no, explain why no disbursements were made.

Huawei Technologies USA, Inc.: None necessary

Consulate General of The People's Republic of China in New York: Assignment terminated

If yes, set forth below in the required detail and separately for each foreign principal an account of such monies, including monies transmitted, if any, to each foreign principal.

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
See Appendix for Response					

\$ 157,543.04

Total

**(b) DISBURSEMENTS-THINGS OF VALUE**

During this 6 month reporting period, has the registrant disposed of anything of value<sup>10</sup> other than money in furtherance of or in connection with activities on behalf of any foreign principal named in Items 7, 8, or 9 of this statement?

Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date	Recipient	Purpose	Thing of Value
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**(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS**

During this 6 month reporting period, has the registrant (or any short form registrant) from its own funds and on its own behalf either directly or through any other person, made any contributions of money or other things of value<sup>11</sup> in connection with an election to any political office, or in connection with any primary election, convention, or caucus held to select candidates for political office?

Yes ☒ No ☐

If yes, furnish the following information:

Date	Donor	Political Organization/Candidate	Method	Amount/Thing of Value
10/27/2020	Peyton Francum	Act Blue - Joe Biden	Online	\$ 5.00
10/23/2020	Peyton Francum	Act Blue - Biden / Harris	Online	\$ 10.00
09/30/2020	Peyton Francum	Act Blue - Joe Biden	Online	\$ 5.00
09/21/2020	Peyton Francum	Act Blue - Joe Biden	Online	\$ 15.00
09/21/2020	Peyton Francum	Act Blue - Get Mitch	Online	\$ 15.00
09/18/2020	Peyton Francum	Act Blue -Jaime Harrison	Online	\$ 5.00
10/14/2020	Rebecca Baumgaertner	Joe Biden / Kamala Harris	Credit card	\$ 12.00
				\$ .00
10/05/2020	Katharine Dilyard	Biden for President	Credit Card	\$ 50.00
12/23/2020	Peyton Francum	Act Blue	Credit Card	\$ 5.00
11/23/2020	Peyton Francum	Act Blue	Credit Card	\$ 5.00
10/27/2020	Peyton Francum	Act Blue- Biden Victory Fund	Credit Card	\$ 5.00
10/23/2020	Peyton Francum	Act Blue	Credit Card	\$ 10.00
09/30/2020	Peyton Francum	Act Blue- Biden Victory Fund	Credit Card	\$ 5.00
09/21/2020	Peyton Francum	Act Blue	Credit Card	\$ 15.00
09/21/2020	Peyton Francum	Act Blue- Biden Victory Fund	Credit Card	\$ 15.00
09/18/2020	Peyton Francum	Act Blue- Jaime Harrison	Credit Card	\$ 5.00
08/31/2020	Peyton Francum	Act Blue- Biden Victory Fund	Credit Card	\$ 15.00
07/30/2020	Peyton Francum	Act Blue- Biden Victory Fund	Credit Card	\$ 10.00
10/14/2020	Rebecca Baumgaertner	Joe Biden	Credit Card	\$ 12.00

10, 11 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks," and the like.

## V - INFORMATIONAL MATERIALS

16. (a) During this 6 month reporting period, has the registrant prepared, disseminated or caused to be disseminated any informational materials?<sup>12</sup> Yes ☒ No ☐

(b) If yes, identify each such foreign principal for which informational materials were disseminated and respond to the remaining items in this section.

Huawei Technologies USA, Inc.

17. During this 6 month reporting period, has a budget been established or specified sum of money allocated to finance the registrant's activities in preparing or disseminating informational materials? Yes ☐ No ☒

If yes, identify each such foreign principal, and specify the period of time and the amount.

Foreign Principal	Period of Time	Amount
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18. During this 6 month reporting period, has the registrant's activities in preparing, disseminating or causing the dissemination of informational materials included the use of any of the following:

- |  |   |   |  |
|--|---|---|--|
| <input type="checkbox"/> Magazine or newspaper               | <input type="checkbox"/> Advertising campaigns  | <input type="checkbox"/> Press releases       | <input type="checkbox"/> Pamphlets or other publications |
| <input type="checkbox"/> Lectures or speeches                | <input type="checkbox"/> Radio or TV broadcasts | <input type="checkbox"/> Motion picture films | <input type="checkbox"/> Letters or telegrams            |
| <input checked="" type="checkbox"/> Email                    |   |   |  |
| <input type="checkbox"/> Website URL(s): _____               |   |   |  |
| <input type="checkbox"/> Social media websites URL(s): _____ |   |   |  |
| <input type="checkbox"/> Other (specify) _____               |   |   |  |

19. During this 6 month reporting period, has the registrant prepared, disseminated, or caused to be disseminated informational materials among any of the following groups:

- |  |   |   |
|--|---|---|
| <input type="checkbox"/> Public officials      | <input checked="" type="checkbox"/> Newspapers        | <input type="checkbox"/> Libraries                |
| <input type="checkbox"/> Legislators           | <input checked="" type="checkbox"/> Editors           | <input type="checkbox"/> Educational institutions |
| <input type="checkbox"/> Government agencies   | <input type="checkbox"/> Civic groups or associations | <input type="checkbox"/> Nationality groups       |
| <input type="checkbox"/> Other (specify) _____ |   |   |

20. Indicate the language used in the informational materials:

- ☒ English ☐ Other (specify) \_\_\_\_\_

21. Has the registrant filed with the FARA Unit, U.S. Department of Justice a copy of each item of such informational materials prepared, disseminated or caused to be disseminated during this 6 month reporting period? Yes ☒ No ☐

If no, please please file the required informational materials.

22. Has the registrant labeled each item of such informational materials with the statement required by Section 4(b) of the Act?

Yes ☒ No ☐

<sup>12</sup> The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.



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**VI - EXECUTION**

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date	Printed Name	Signature <sup>13</sup>
01/29/2021	Ian Glover	/s/Ian Glover
_____	_____	_____
_____	_____	_____
_____	_____	_____

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<sup>13</sup> This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

**EXECUTION**

In accordance with 28 U.S.C. § 1746, and subject to the penalties of 18 U.S.C. § 1001 and 22 U.S.C. § 618, the undersigned swears or affirms under penalty of perjury that he/she has read the information set forth in this statement filed pursuant to the Foreign Agents Registration Act of 1938, as amended, 22 U.S.C. § 611 *et seq.*, that he/she is familiar with the contents thereof, and that such contents are in their entirety true and accurate to the best of his/her knowledge and belief.

Date

Printed Name

Signature

1/29/2021

IAN GLOVER

*Ian Glover*

## Appendix

### Response to Item 5(b)

**Item 5(b):** During this 6 month reporting period, has the registrant hired as employees or in any other capacity, any persons who rendered or will render services to the registrant directly in furtherance of the interests of any foreign principal(s) in other than a clerical or secretarial, or in a related or similar capacity?

<b>Name</b>	<b>Residence Address</b>	<b>Citizenship</b>	<b>Position</b>	<b>Date Assumed</b>
Mr. Travis Murdock	15527 Densmore Ave N Shoreline, WA 98133	UNITED STATES	Executive Vice President	11/02/2020
Mr. Guen Yi	20 Vera Pl Montclair, NJ 07042	UNITED STATES	Senior Vice President	11/02/2020
Ms. Jenny Barrett		UNITED STATES	Account Supervisor	11/02/2020
Ms. Maryam Ayromlou		UNITED STATES	Executive Vice President	11/02/2020
Robin Kim		UNITED STATES	Executive Vice President	11/02/2020
Noah Dickter		UNITED STATES	Assistant Account Executive	11/02/2020
Peyton Francum		UNITED STATES	Assistant Account Executive	11/02/2020
Rebecca Baumgaertner	12 Goldsmith Drive Holmdel, NJ 07733	UNITED STATES	Senior Account Executive	11/02/2020
Jessica Savarese		UNITED STATES	Account Supervisor	11/02/2020
Ms. Katie Caughman	400 Anza St., #406 San Francisco, CA 94118	UNITED STATES	Account Supervisor	12/18/2020

## Appendix

### Response to Item 12-Detail

Foreign Principal(s)	Date	Contact	Method	Purpose
Huawei Technologies USA, Inc.	12/17/2020	CNET/Red Ventures	E-MAIL	Outreach for a background meeting with Huawei USA executives - 3 topics suggested
Huawei Technologies USA, Inc.	12/17/2020	FierceWireless/Quest	E-MAIL	Outreach for a background meeting with Huawei USA executives - 3 topics suggested
Huawei Technologies USA, Inc.	12/17/2020	Inside Cybersecurity/IWP News	E-MAIL	Outreach for a background meeting with Huawei USA executives - 3 topics suggested
Huawei Technologies USA, Inc.	12/17/2020	Mashable	E-MAIL	Outreach for a background meeting with Huawei USA executives - 3 topics suggested
Huawei Technologies USA, Inc.	12/17/2020	SDX Central	E-MAIL	Outreach for a background meeting with Huawei USA executives - 3 topics suggested
Huawei Technologies USA, Inc.	12/17/2020	Security Week	E-MAIL	Outreach for a background meeting with Huawei USA executives - 3 topics suggested
Huawei Technologies USA, Inc.	12/17/2020	The Information	E-MAIL	Outreach for a background meeting with Huawei USA executives - 3 topics suggested
Huawei Technologies USA, Inc.	12/17/2020	The Verge	E-MAIL	Outreach for a background meeting with Huawei USA executives - 3 topics suggested
Huawei Technologies USA, Inc.	12/17/2020	The Washington Post	E-MAIL	Outreach for a background meeting with Huawei USA executives - 3 topics suggested
Huawei Technologies USA, Inc.	12/18/2020	CNET/Red Ventures	E-MAIL	Follow-up - meeting scheduled/confirmation
Huawei Technologies USA, Inc.	12/18/2020	The Information	E-MAIL	Outreach for a background meeting with Huawei USA executives - Topics & links attached
Huawei Technologies USA, Inc.	12/18/2020	The Information	ZOOM	Facilitated Meeting with Huawei US & Canadian Executives

Foreign Principal(s)	Date	Contact	Method	Purpose
Huawei Technologies USA, Inc.	12/20/2020	CNBC and NBCUniversal	E-MAIL	Outreach for a background meeting with Huawei USA executives - 3 topics suggested
Huawei Technologies USA, Inc.	12/20/2020	The Washington Post	E-MAIL	Final Prep for Call with Huawei USA executives- includes topics and links to articles.
Huawei Technologies USA, Inc.	12/21/2020	CNET/Red Ventures	E-MAIL	Final Prep for Call with Huawei USA executives- includes topics and links to articles
Huawei Technologies USA, Inc.	12/21/2020	Inside Cybersecurity/IWP News	E-MAIL	Outreach for a background meeting with Huawei USA executives - 3 topics suggested
Huawei Technologies USA, Inc.	12/21/2020	The Washington Post	ZOOM	Facilitated Meeting with Huawei US & Canadian Executives
Huawei Technologies USA, Inc.	12/31/2020	Inside Cybersecurity/IWP News	E-MAIL	Follow up after meeting with Huawei USA executives
Huawei Technologies USA, Inc.	12/31/2020	Inside Cybersecurity/IWP News	ZOOM	Facilitated Meeting with Huawei US & Canadian Executives

**Appendix**  
**Response to Item 14(a)-Detail**

<b>Foreign Principal(s)</b>	<b>Date Received</b>	<b>From Whom</b>	<b>Purpose</b>	<b>Amount</b>	<b>Subtotal</b>
NEOM Company	12/02/2020	NEOM Company	Fee and Expenses through July 2020	\$238,488.41	
NEOM Company	12/31/2020	NEOM Company	Fee and Expenses August to October 2020	\$345,998.41	
NEOM Company	-----	-----	-----	----->	\$584,486.81
Huawei Technologies USA, Inc.	11/10/2020	Huawei Technologies USA Inc	Fee Deposit	\$120,552.63	
Huawei Technologies USA, Inc.	-----	-----	-----	----->	\$120,552.63

## Appendix

### Response to Item 15(a)-Detail

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
NEOM Company	06/30/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 6.00	
NEOM Company	06/30/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 87.50	
NEOM Company	06/30/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 100.00	
NEOM Company	06/30/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 163.00	
NEOM Company	06/30/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 357.00	
NEOM Company	06/30/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 513.00	
NEOM Company	06/30/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 4,533.00	
NEOM Company	06/30/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 5,333.00	
NEOM Company	06/30/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$10,912.15	
NEOM Company	06/30/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$14,800.00	
NEOM Company	07/10/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 5,750.00	
NEOM Company	07/27/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 4,700.00	
NEOM Company	08/07/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 65.00	
NEOM Company	08/07/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 100.00	
NEOM Company	08/07/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 108.00	
NEOM Company	08/07/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 122.00	
NEOM Company	08/07/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 147.00	



Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
NEOM Company	08/07/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 168.00	
NEOM Company	08/07/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 200.00	
NEOM Company	08/07/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 248.00	
NEOM Company	08/07/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 314.00	
NEOM Company	08/07/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 391.00	
NEOM Company	08/07/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 431.00	
NEOM Company	08/07/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 440.00	
NEOM Company	08/07/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 459.00	
NEOM Company	08/07/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 543.00	
NEOM Company	08/07/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 566.00	
NEOM Company	08/07/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 577.00	
NEOM Company	08/07/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 2,939.63	
NEOM Company	08/07/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 6,900.00	
NEOM Company	08/15/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 14.40	
NEOM Company	08/17/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$10,000.00	
NEOM Company	08/17/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$15,000.00	
NEOM Company	08/28/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 350.00	
NEOM Company	09/04/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 218.69	
NEOM Company	09/04/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 634.01	



Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
NEOM Company	09/04/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 689.75	
NEOM Company	09/04/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 7,168.59	
NEOM Company	09/09/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 44.00	
NEOM Company	09/09/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 186.00	
NEOM Company	09/09/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 240.00	
NEOM Company	09/09/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 266.00	
NEOM Company	09/09/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 330.00	
NEOM Company	09/09/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 421.00	
NEOM Company	09/09/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 658.00	
NEOM Company	09/09/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 803.00	
NEOM Company	09/10/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 1,693.44	
NEOM Company	09/15/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 90.00	
NEOM Company	09/15/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 450.00	
NEOM Company	10/09/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 44.00	
NEOM Company	10/09/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 84.00	
NEOM Company	10/09/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 200.00	
NEOM Company	10/09/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 208.00	
NEOM Company	10/09/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 248.00	
NEOM Company	10/09/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 329.40	

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
NEOM Company	10/09/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 412.00	
NEOM Company	10/09/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 454.00	
NEOM Company	10/09/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 640.00	
NEOM Company	10/09/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 708.00	
NEOM Company	10/09/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 849.00	
NEOM Company	10/09/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 1,888.00	
NEOM Company	10/15/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 16.53	
NEOM Company	10/15/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 23.06	
NEOM Company	10/15/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 36.79	
NEOM Company	10/15/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 49.00	
NEOM Company	10/28/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 112.00	
NEOM Company	10/28/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 400.00	
NEOM Company	10/28/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 416.00	
NEOM Company	10/28/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 465.00	
NEOM Company	10/28/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 654.00	
NEOM Company	10/28/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 1,772.00	
NEOM Company	11/19/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 800.00	
NEOM Company	11/19/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$16,000.00	
NEOM Company	11/25/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 100.00	

Foreign Principal	Date	Recipient	Purpose	Amount	Subtotal
NEOM Company	11/25/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 600.00	
NEOM Company	11/25/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 1,650.00	
NEOM Company	12/15/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$ 427.00	
NEOM Company	12/15/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$11,727.10	
NEOM Company	12/23/2020	Neom Vendor	Professional Services & expense Disbursements on Behalf of Neom	\$15,000.00	
NEOM Company	-----	-----	-----	----->	\$157,543.04